

1 GRIFFITH H. HAYES, ESQ.
Nevada Bar No. 7374
2 DANIELLE A. KOLKOSKI, ESQ.
Nevada Bar No. 8506
3 **LITCHFIELD CAVO LLP**
3993 Howard Hughes Parkway, Suite 100
4 Las Vegas, Nevada 89169
Telephone: (702) 949-3100
5 Facsimile: (702) 916-1776
Hayes@LitchfieldCavo.com
6 kolkoski@LitchfieldCavo.com
Attorneys for Plaintiff and Counterdefendant
7 THE CINCINNATI SPECIALTY UNDERWRITERS INSURANCE
8 COMPANY

9
10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA – NORTHERN DIVISION

11 THE CINCINNATI SPECIALTY
12 UNDERWRITERS INSURANCE COMPANY

13 Plaintiff.

14 v.

15 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock (81);
16 LYNN LLOYD, individually; AND TRACY
TURNBOW (Interested Party)

17 Defendants.
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19 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock; and
20 BARBARA LYNN LLOYD,

21 Counterclaimants,

22 v.

23 THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE COMPANY;
24 BEEHIVE INSURANCE AGENCY, INC., a
Utah corporation, doing business as
25 CERTIFIED INSURANCE SERVICES, INC.,

26 Counterdefendants.
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CASE NO.: 3:20-cv-00272-MMD-BNW

**STIPULATION AND ORDER TO AMEND
DISCOVERY PLAN AND SCHEDULING
ORDER**

(FIRST REQUEST)

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

BEEHIVE INSURANCE AGENCY, INC.

Third-Party Plaintiff,

v.

MOORE CLEMENS & CO, INC., a Virginia
corporation, and DOES 1-X, inclusive,

Third-Party Defendants.

Plaintiff/Counterdefendant, THE CINCINNATI SPECIALTY UNDERWRITERS INSURANCE COMPANY (“CSU”), by and through its attorneys of record, the law firm of LITCHFIELD CAVO LLP, Defendants/Counterclaimants RED ROCK HOUNDS and LYNN LLOYD, by and through their attorneys of record, the law firm of Richard Hill, Ltd., Counterdefendant/Third-Party Plaintiff, BEEHIVE INSURANCE dba CERTIFIED INSURANCE SERVICES (“Beehive”), by and through its attorneys of record, the law firm of Erickson, Thorpe & Swainston, Ltd., Third-Party Defendant MOORE CLEMENS & CO. (“Moore”), by and through its attorneys of record, the law firm of Lewis Brisbois Bisgaard & Smith LLP, and Defendant/Interested Party, TRACY TURNBOW, by and through her attorneys of record, the law firm of Coulter Harsh Law, (collectively “Parties”), pursuant to FRCP 26(f), hereby jointly stipulate to the Stipulation and Order to Amend Discovery Plan and Scheduling Order (First Request) as follows:

1. Statement Specifying the Discovery Completed

The following discovery has been completed:

- Beehive’s Request for Production to CSU
- CSU’s Response to Beehive’s Request for Production of Documents

2. Specific Description of the Discovery that Remains to be Completed

The following discovery needs to be completed:

- Deposition of Tracy Turnbow set for December 10, 2020
- CSU written discovery to the Parties
- Red Rock Hounds and Lynn Lloyd written discovery to the Parties
- Beehives’ written discovery to the Parties
- Moore’s written discovery to the Parties

- Fed. R. Civ. P. 30(b)(6) deposition of CSU
- Scott Tepper, Fed. R. Civ. P. 30(b)(6) witness for Red Rock Hounds to be set for January 7, 2021
- Fed. R. Civ. P. 30(b)(6) deposition of Beehive
- Fed. R. Civ. P. 30(b)(6) deposition of Moore
- Deposition of Lynn Lloyd to be set for January 7, 2021
- Deposition of Angela Murray to be set for January 7, 2021
- Depositions of percipient witness
- Depositions of expert witness

3. Reasons Why Discovery Is Not Completed

This is a declaratory relief action wherein CSU respectfully requests this Court adjudicate whether insurance coverage exists in an underlying State matter entitled Tracy Turnbow v. Red Rock Hounds and Lynn Loyd, in the Second Judicial District Court, State of Nevada, County of Washoe, Case No. CV020-0080. The Parties have been tracking the Federal matter with the discovery in the State matter to save fees and costs. The facts in this matter are in dispute and the Parties need additional discovery.

The Parties originally submitted a Joint Discovery Plan and Scheduling Order on September 3, 2020 requesting 365 days for discovery. (ECF 38). On September 10, 2020, the Court denied the Parties request for 365 days for discovery and granted the Parties 270 days. (ECF 39). The Parties submitted an Amended Joint Stipulated Discovery Plan and Scheduling Order on September 23, 2020 (ECF 40) and the Court granted the same on September 25, 2020 (ECF 41).

There are six parties in this matter and schedules have been difficult to coordinate. The Parties are in the process of scheduling percipient and party depositions so they can mediate before the expert disclosure deadline. All counsel have been diligent and are working in good faith to complete the discovery.

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4. Proposed Schedule for Completing All Remaining Discovery

DESCRIPTION	CURRENT DATES	PROPOSED DATES
Amend Pleadings/Add Parties	Friday November 20, 2020	Monday March 22, 2021
Initial Disclosure of Experts	Thursday January 21, 2021	Friday May 21, 2021
Rebuttal Experts	Friday February 20, 2021	Friday June 18, 2021
Close of Discovery	Friday April 16, 2021	Friday August 13, 2021
Dispositive Motions	Sunday May 16, 2021	Monday September 13, 2021
Joint Pre-Trial Order	Tuesday June 15, 2021	Wednesday October 13, 2021

IT IS SO STIPULATED.

Dated: November 17, 2020

LITCHFIELD CAVO LLP

By: /s/ Danielle A. Kolkoski, Esq.
 GRIFFITH H. HAYES, ESQ.
 Nevada Bar No. 7374
 DANIELLE A. KOLKOSKI, ESQ.
 Nevada Bar No. 8506
 3993 Howard Hughes Parkway, Suite 100
 Las Vegas, Nevada 89169
 T: 702-949-3100/F: 702-916-1779
 Hayes@LitchfieldCavo.com
 Kolkoski@LitchfieldCavo.com
Attorneys for Plaintiff

Dated: November 17, 2020

RICHARD G. HILL, LTD.

By: /s/ Richard G. Hill, Esq.
 RICHARD G. HILL, ESQ.
 Nevada Bar No. 596
 652 Forest Street
 Reno, NV 89509
 T: 775-348-0888
 rhill@richardhillaw.com
*Attorneys for Defendants and
 Counterclaimants Barbara Ann Lloyd and Red
 Rock Hounds*

1 Dated: November 17, 2020

COULTER HARSH LAW

2 By: /s/ Curtis B. Coulter, Esq.
3 CURTIS B. COULTER, ESQ.
4 Nevada Bar No. 3034
5 403 Hill Street
6 Reno, Nevada 89501
7 T: 775-324-3380
8 curtis@coulterharshlaw.com
9 *Attorney for Defendant and Interested Party*
10 *Tracy Turnbow*

11 Dated: November 18, 2020

ERICKSON THORPE & SWAINSTON, LTD.

12 By: /s/ John C. Boyden, Esq.
13 John C. Boyden, Esq.
14 Nevada Bar No. 3917
15 99 W. Arroyo Street
16 PO Box 3559
17 Reno, Nevada 89505
18 T: 775-786-3930
19 jboyden@etsreno.com
20 *Attorneys for Counterdefendant and Third-*
21 *Party Plaintiff Beehive Insurance Agency*

22 Dated: November 20, 2020

LEWIS BRISBOIS BISGAARD & SMITH LLP

23 By: /s/ Jack Angaran, Esq.
24 Jack Angaran, Esq.
25 Nevada Bar No. 711
26 5555 Kietzke Lane, Suite 200
27 Reno, Nevada 89511
28 T: 775-827-6440
jack.angaran@lewisbrisbois.com
Attorneys for Third-Party Defendant Moore,
Clemens & Co., Inc.

1 Dated: November 20, 2020

RESNICK & LOUIS, P.C.

2 By: /s/ Prescott Jones, Esq.
3 Prescott Jones, Esq.
4 Nevada Bar No. 11617
5 Emily K. Dotson, Esq.
6 (*Pro Hac Vice forthcoming*)
7 8925 West Russell Road, Suite 220
8 Las Vegas, NV 89148-2540
9 pjones@rlattorneys.com
10 *Attorneys for Intervenor American Reliable*
11 *Insurance Company*

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9 **SCHEDULING ORDER**

10 The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order to this
11 action pursuant to the Federal Rules of Civil Procedure 16(b) and LR 16-1.

12 **IT IS SO ORDERED.**

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14 Date: _____, 2020

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16 _____
17 United States Magistrate Judge
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